

IN THE U.S. DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

KENNY HILL, PLAINTIFF :
V. :
JOHN J. LAMANNA, ET. AL. :

CA 05-160 Eui

MOTION FOR THE APPOINTMENT OF COUNSEL

Plaintiff Kenny Hill, pursuant to §1915, request this court to appoint counsel to represent him in this case for the following reasons:

1. The Plaintiff is unable to afford counsel.
2. The Plaintiff has limited knowledge of the law.
3. The issues involved are complex.
4. Plaintiff expect the facts to be strongly disputed.

5-20-05

Date


Kenny Hill
FCC Petersburg Law
P.O. Box 1000
Petersburg, VA 23804

ORIGINAL

IN THE U.S. DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

KENNY HILL, PLAINTIFF

v.

JOHN J. LAMANNA, et. al.

AFFIDAVIT IN SUPPORT OF THE PLAINTIFF'S
MOTION FOR THE APPOINTMENT OF COUNSEL

KENNY HILL, being duly sworn, deposes and says:

1. I am the Plaintiff in the above entitled case. I make this affidavit in support of my motion for the appointment of ~~court~~ counsel.

2. The complaint in this case alleges that the staff at Federal Correctional Institution McKean, Bradford, Pennsylvania knowingly exposed me to hazardous substances/materials by knowingly allowing unsafe working conditions. These conditions caused me to suffer significant injuries and also placed my future health at risk. My Constitutional Rights were violated.

3. This case is complex because Plaintiff expects the facts to be strongly disputed by the defendants.

4. Plaintiff is incarcerated, the defendants will undoubtedly claim security breaches exist if plaintiff is allowed discovery materials relevant to the case.

5. The Plaintiff has demanded a jury trial.

6. The Plaintiff can not afford counsel.

7. The Plaintiff has limited knowledge of the law.

8. The Plaintiff prepared his complaint with the help of a jail house lawyer.

9. The Plaintiff's case will require depositions of witnesses that he can not get to.

10. These facts, along with the legal merits of Plaintiff's claims, support the appointment of counsel to represent the Plaintiff.

WHEREFORE, the Plaintiff's motion for the appointment of counsel should be granted.

Sworn to before me this

10 day of May, 2005


Kenny Hill


Zelma Phenix
Notary Public

MY COMMISSION EXPIRES
29 FEBRUARY 2008